

UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	No.: 24-CR-03-11-SM-AJ
)	
SERENE HULL)	
_____)	

MOTION FOR BAIL HEARING

NOW comes the defendant in the above entitled matter and respectfully moves this Honorable Court to hold a bail hearing in the above entitled matter.

As grounds therefore, it is stated that:

1. The defendant was initially ordered detained, without prejudice, after waiving a detention hearing on February 21, 2024.
2. The court ordered that the defendant be allowed to participate in the therapeutic community ("TC") program while detained.
3. The defendant has completed the TC program and secured further treatment in an inpatient program.
4. The defendant requires court action to address the issue of bail in order to continue with treatment and recovery.
5. The United States has been contacted regarding this request and has indicated it's assent to the defendant's request.
6. No legal memorandum accompanies this motion as the relief requested is fully set out herein.

WHEREFORE, the Defendant requests this Court:

- A. Allow this Motion for Bail Hearing;
- B. Schedule a hearing at the court's convenience; and
- C. Such other relief as the Court deems just and equitable.

Respectfully submitted,
SERENE HULL
By her attorney

/s/ Patrick J. Richard

Dated: 6/7/24

PATRICK J. RICHARD
150 Westford Road, Suite 26
Tyngsborough, MA 01879
978-458-4279
attyrichard@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of JUNE 2024 served the foregoing motion by ECF delivery upon Assistant US Attorney Heather Cherniske for the US.

/s/ Patrick J. Richard

Patrick J. Richard, Esq.